

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

MATTHEW TORRES

Plaintiff,

-against-

ST. PETER'S COLLEGE and ALLIEDBARTON  
SECURITY SERVICES, INC.

Defendants.

Index No.: 07-112350

Plaintiff designates  
New York County as the  
Place of trial

The basis of the venue  
is where the plaintiff  
resides.

**SUMMONS:**

Plaintiff resides at  
280 Madison Street  
Apt. #511  
New York, NY 10002  
County of New York

To the above named defendants.

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's Attorney(s) with 20 days after the service of this summons, exclusive of the day of service (or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for relief demanded in the complaint.

Dated: August 15, 2007

Defendant's address:  
ST. PETER'S COLLEGE  
2641 Kennedy Boulevard  
Jersey City, New Jersey 07306

BEAL & BEAL, ESQS.  
Attorney for the Plaintiff  
34 Birchwood Park Crescent  
Jericho, New York 11753  
(516) 938-0877

ALLIEDBARTON SECURITY SERVICES, INC.  
3606 Horizon Drive  
King of Prussia, Pennsylvania 19406

NEW YORK  
COUNTY CLERK'S OFFICE

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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MATTHEW TORRES

Plaintiff,

**VERIFIED COMPLAINT**

Index No:

-against-

ST. PETER'S COLLEGE and ALLIEDBARTON SECURITY SERVICES, INC.

Defendants,  
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Plaintiff, by his attorney(s), BEAL & BEAL, ESQS, complaining of the  
defendants respectfully alleges as follows:

**AS AND FOR A FIRST CAUSE OF ACTION ON BEHALF**  
**OF THE PLAINTIFF MATTHEW TORRES**

1. That upon and belief and at all times hereinafter mentioned, plaintiff was and still is a resident of the County, City, and State of New York.
2. That upon information and belief and at all times hereinafter mentioned, Defendant ST. PETER'S COLLEGE was and still is a private educational institution existing by virtue of the laws of the State of New Jersey, with a location at 2641 Kennedy Boulevard, Jersey City, New Jersey.
3. That upon information and belief and at all times hereinafter mentioned, defendant ALLIEDBARTON SECURITY SERVICES, INC. is a domestic corporation with a corporate office located at 3606 Horizon Drive, King of Prussia, Pennsylvania.

4. That upon information and belief and at all times hereinafter mentioned, defendant ALLIEDBARTON SECURITY SERVICES, INC. is a foreign corporation with a corporate office located at 3606 Horizon Drive, King of Prussia, Pennsylvania.
5. That upon information and belief, and at all times hereinafter mentioned, the defendant ST. PETER'S COLLEGE, was the owner, lessee, permittee, or otherwise in possession and control of the facility located at 2641 Kennedy Boulevard, Jersey City, New York 07036.
6. That upon information and belief, and at all times herein mentioned, the defendant ALLIEDBARTON SECURITY SERVICES, INC. was hired and retained by defendant ST. PETER'S COLLEGE to provide security services for the students and college community at large.
7. That upon information and belief and at all times herein mentioned, both the defendants undertook and obligated themselves to the students at the school to secure, maintain and operate it with a due and proper regard for the safety of its students, including plaintiff herein.
8. That on or about the 8<sup>th</sup> day of December, 2006, while the plaintiff was lawfully on the campus of defendant ST. PETER'S COLLEGE, he was viciously assaulted and caused to sustain serious injuries resulting from the defendants' failure to provide proper supervision and security; that the defendants, its agents, servants, and/or employees negligently caused and permitted a hazardous and dangerous condition to exist by virtue of its failure to properly hire and train security personnel, and to operate, maintain and

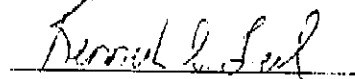
secure said school premises, thereby endangering it's students, specifically the plaintiff herein.

9. The defendants, it's agents, servants and/or employees were reckless, careless and negligent in failing to provide proper, sufficient, competent and adequate security to the students lawfully at the subject school, in failing to hire trained and competent personnel; in failing to have efficient and knowledgeable security personnel; in causing and creating a hazardous and dangerous condition at the school; in leaving students in dangerous circumstances; in violating the applicable security rules and security regulations; and the defendants, its agents, servants and /or employees, were otherwise reckless, careless and negligent.
10. That as a result of both of the defendants' negligence, plaintiff MATTHEW TORRES was caused to suffer severe and permanent injuries, including severe facial scarring ; further plaintiff required hospital attention and may require such care in the future; plaintiff became substantially disabled; experienced extreme mental anguish and distress, psychological injuries and trauma; plaintiff was unable to attend to his usual duties and activities; and further experienced extreme pain and suffering; difficulty in sleeping; nightmares, and plaintiff has been otherwise damaged, all of which are permanent in nature and continuing into the future.
11. That by reason of the foregoing, the plaintiff MATTHEW TORRES, has been damaged in a sum to be determined by a court of competent jurisdiction which exceeds the jurisdictional limit of all lower courts.

WHEREFORE, plaintiff demands judgment against both defendants in the First Cause of Action in a sum to be determined by a court of competent jurisdiction which exceeds the jurisdictional limits of all lower courts.

Dated: Jericho, New York  
August 15, 2007

Yours, etc.



BEAL & BEAL, ESQS.

Attorneys for Plaintiff

MATTHEW TORRES

By: Kenneth I. Beal, Esq.

34 Birchwood Park Crescent

Jericho, New York 11753

(516) 938-0877

VERIFICATION

STATE OF NEW YORK )  
 ) ss.:  
COUNTY OF NEW YORK )

I, the undersigned, being duly sworn, hereby deposes and says that I am the plaintiff in the action and that I have read the foregoing VERIFIED COMPLAINT and know the contents thereof. That the same is true to my own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

  
MATTHEW TORRES

Sworn to before me this  
17 day of August 2007.

KENNETH I. BEAL  
NOTARY PUBLIC, State of New York  
No. 02BE4996859  
Qualified in Queens County  
Commission Expires May 2<sup>nd</sup>, 2010

